1	Michael P. Balaban State Bar No. 9370		
2	LAW OFFICES OF MICHAEL P. BALABAN 10726 Del Rudini Street		
3	Las Vegas, NV 89141 (702)586-2964		
4	Fax: (702)586-3023 E-Mail: mbalaban@balaban-law.com		
5	Attorney for Plaintiff		
6			
7			
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	District		
11	RONNI BOSKOVICH,	CASE NO. 2:21-cv-00670-JAD-DJA	
12		Stipulation and Order to File	
13	Plaintiff,	Amended Complaint	
14	VS.		
15	NYE COUNTY, a political subdivision, and		
16	municipality including its department, NYE COUNTY DISTRICT ATTORNEY'S		
17	OFFFICE; CHRIS ARABIA, in his individual		
18	and official capacity; LEO BLUNDO, in his individual and official capacity; DOES I -50;	ECF No. 16	
19	and ROE CORPORATIONS I -50,		
20	Defendants.		
21	Defendants.		
22			
23			
24	IT IS HEREBY STIPULATED by and between the parties hereto through their respective		
25	attorneys of record that Plaintiff RONNI BOSKOVICH ("Plaintiff") may file an Amended		
26	Complaint, a copy of which is attached hereto as Exhibit "A".		
27	IT IS FURTHER STIPULATED that Defendants waive notice and service of the amended		
28			

1	complaint and the answer of Defendant NYE COUNTY and the motion to dismiss of Defendants	
2	CHRIS ARABIA and LEO BLUNDO ("Arabia" and "Blundo") remain in full force and effect	
3	except that the motion to dismiss of Defendants Arabia and Blundo will not seek dismissal of	
4	Plaintiff's claims based upon a failure to obtain a Notice of Right to Sue which has now been	
5	obtained and is attached to the Amended Complaint. However, all other arguments set forth in	
6	Defendants Arabia and Blundo's Motion to Dismiss are preserved and remain ripe for	
7	determination.	
8	RESPECTFULLY SUBMITTED this 4 th day of August, 2021.	
9	LAW OFFICES OF MICHAEL P.	LEMONS, GRUNDY &
10	BALABAN	EISENBERG
11	/s/ Michael P. Balaban	/s/ Rebecca Bruch
12	Michael P. Balaban, Esq. 10726 Del Rudini St.	Rebecca Bruch, Esq. Nevada Bar No. 7289
13	Las Vegas, NV 89141 Attorney for Plaintiff	6005 Plumas Street, Third Floor
14		Reno, NV 89519 Attorney for Defendant NYE
15	Dated: August 4, 2021	COUNTY
16		Dated: August 4, 2021
17		MARQUIS AURBACH
18		COFFING
19		/s/ Brian R. Hardy
20		Brian R. Hardy, Esq. Nevada Bar No. 10068
21		10001 Park Run Drive Las Vegas, NV 89145
22		Attorney for Defendants CHRIS
23		ARABIA and LEO BLUNDO
24	ORDER	
25		
26	Based on the parties' stipulation [ECF No. 16] and with good cause appearing, IT IS SO ORDERED. The plaintiff has until 9/17/21 to file the amended complaint in the format provided	
27	at ECF No. 16-1. The court will resolve the motion to dismiss [ECF No. 6] in due course.	

U.S. District Judge Jennifer A. Dorsey Dated: September 14, 2021

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